

NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA 6908 '98 AUG -5 P1:41
AND 21 CFR §101.93

This notification is being filed on behalf of 4Health, Inc., doing business as Nature's Secret, which is the distributor of the product(s) which bear the statements identified in this notification. Its business address is: 5485 Conestoga Court, Boulder CO 80301. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 C.F.R. §101.93. The dietary supplement product on whose label or labeling the statements appear is **Ultimate Energy**.

The text of each structure-function statement for which notification is now being given is:

- Statement 1. Assists the body's natural ability to endure rigorous exercise.
- Statement 2. Aids the body to fight off general weakness and fatigue.
- Statement 3. Enhance mental stamina.
- Statement 4. Abate the effects of stress.
- Statement 5. Helps increase the body's ability to deal with fatigue and stress.
- Statement 6. Boosts energy.
- Statement 7. Sustains strength. Reinforces the body's natural defenses
- Statement 8. Supports the body's own ability to demonstrate improved vitality and increased endurance.
- Statement 9. Ginseng has been used to battle the effects of fatigue for thousands of years.
- Statement 10. The combination of these ginsengs reinforces your body's natural defenses and gives you vigor.
- Statement 11. Helps you perform at your physical best by enabling your body to use oxygen much more efficiently.
- Statement 12. By better utilizing oxygen your heart does not have to pump as hard and less lactic acid will be produced. Lowering lactates alleviates the stiff muscles from strenuous activities.
- Statement 13. Siberian Ginseng could be considered a nonspecific immunostimulant. Enhancement of the immune system enables your body to combat colds and infections.
- Statement 14. Supports the adrenal glands.
- Statement 15. Supports adrenal function.
- Statement 16. Beneficial for kidney health.
- Statement 17. Eucommia is believed to help strengthen tendons and bones.
- Statement 18. Important support ingredient for energy and balanced mood.
- Statement 19. Is beneficial to the liver.
- Statement 20. An agent to improve mental ability.
- Statement 21. Supports the body's ability to repair connective tissue, the skin, lymph, mucous membranes and blood vessels.
- Statement 22. Bioperine® - a purified alkaloid extract from black pepper specifically developed to address the problem of nutrient bioavailability.

97S-0162

see docket 97S-0163 also

NS30051 06/02/98

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The following summary identifies the dietary ingredient(s) or supplement(s) for which a statement has been made.

<u>Statement Number</u>	<u>Identity of Dietary Ingredient(s) or Supplement that is the Subject of the Statement</u>
1	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, Codonopsis Pilosula Root, Eucommia Ulmoides Bark, American Ginseng Extract, Tienchi Ginseng Root, Astragalus Membranaceous Root, Gotu Kola Herb.
2	Astragalus Membranaceous Root
3	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root.
4	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root Bupleurum Root.
5	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root Bupleurum Root.
6	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root, Eucommia Ulmoides Bark..
7	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root.
8	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root.
9	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root.
10	Panax Ginseng Root Extract, Siberian Ginseng Root Extract, American Ginseng Extract, Tienchi Ginseng Root.
11	Siberian Ginseng Root Extract.
12	Siberian Ginseng Root Extract.
13	Siberian Ginseng Root Extract.
14	Siberian Ginseng Root Extract.
15	Siberian Ginseng Root Extract.
16	Eucommia Ulmoides Bark.
17	Eucommia Ulmoides Bark.
18	Eucommia Ulmoides Bark.
19	Bupleurum Root.
20	Gotu Kola Leaf.
21	Gotu Kola Herb
22	Bioperine®

The following identifies the brand name of each supplement for which a statement is made:


<u>Statement Number</u>	<u>Brand Name</u>	<u>Label or Labeling?</u>
1	Nature's Secret® Ultimate Energy	Both
2	Nature's Secret® Ultimate Energy	Labeling

3	Nature's Secret® Ultimate Energy	Labeling
4	Nature's Secret® Ultimate Energy	Labeling
5	Nature's Secret® Ultimate Energy	Labeling
6	Nature's Secret® Ultimate Energy	Both
7	Nature's Secret® Ultimate Energy	Both
8	Nature's Secret® Ultimate Energy	Labeling
9	Nature's Secret® Ultimate Energy	Labeling
10	Nature's Secret® Ultimate Energy	Labeling
11	Nature's Secret® Ultimate Energy	Labeling
12	Nature's Secret® Ultimate Energy	Labeling
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20	Nature's Secret® Ultimate Energy	Labeling
21	Nature's Secret® Ultimate Energy	Labeling
22	Nature's Secret® Ultimate Energy	Labeling

I, R. Lindsey Duncan, am authorized to certify this Notification on behalf of 4Health, Inc. I certify that the information presented and contained in this Notification is complete and accurate, and that 4Health, Inc. has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: June 30, 1998

By: _____


 Dr. R. Lindsey Duncan CN, ND
 CEO and Formulator, 4Health, Inc.